

# **EXHIBIT 132**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

DONNA CURLING, *et al.*

*Plaintiffs,*

v.

BRAD RAFFENSPERGER, *et al.*,

*Defendants.*

CIVIL ACTION

FILE NO. 1:17-CV-2989-AT

**STATE DEFENDANTS' MOTION FOR LEAVE TO  
FILE EXHIBIT A TO JOINT DISCOVERY STATEMENT UNDER SEAL**

State Defendants seek leave to file Curling Plaintiffs' Exhibit A to the parties' Joint Discovery Dispute Statement [Doc. 1130] under seal. The confidential nature of Exhibit A is the very issue encapsulated in the parties' discovery dispute statement. State Defendants avoid additional argument herein so as to not be accused of asserting arguments related to the dispute in violation of this Court's standing order. State Defendants, however, point the Court to Plaintiffs' motion to seal a prior declaration of Dr. Halderman. [Doc. 1110].

State Defendants attach a proposed order sealing that exhibit with this motion.

Respectfully submitted this 12th day of July 2021.

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